



Emma Gilmore  
Partner

February 28, 2025

**Via E-Mail and ECF**

William B. Monahan  
Sullivan & Cromwell LLP  
125 Broad Street  
New York, NY 10004

Re: *Patel v. Koninklijke Philips N.V., et al., No. 21-cv-4606-ERK-MMH*

Dear Mr. Monahan:

On behalf of Lead Plaintiff Richard Sun and Plaintiff Subhash Patel (“Plaintiffs”), and in accordance with Rule IV(d)(i) of the Court’s Individual Motion Practices and Rules, I enclose the following materials:

- 1) Notice of Plaintiffs’ Motion for Class Certification;
- 2) Plaintiffs’ Memorandum of Law in Support of Their Motion for Class Certification;
- 3) Declaration of Emma Gilmore in Support of Plaintiffs’ Motion for Class Certification and exhibits thereto; and
- 4) [Proposed] Order Certifying the Class, Appointing Class Representatives, and Appointing Class Counsel.

Sincerely,

/s/ Emma Gilmore  
Emma Gilmore

(Enclosures)

cc: All Counsel of Record (via e-mail) (without enclosures for ECF)